From: Nick Stavrakis [nista@otenet.gr] Sent: Monday, April 19, 2004 4:18 PM

To: Benham, Katherine

Subject: Comments on the draft concerning evaluation criteria for urea

Importance: High

Dear Mrs Benham,

I am sending you our comments on the draft concerning evaluation criteria for urea:

Category 2:

Pheromones (natural products synthetically prepared) when used as insect attractants of fruit flies, have the disavantage of attracting only the "innocent" males and only during the mating period of the target insect.

Ammonium carbonate can only be used as solid-state in sticky traps which have harmful effect on small beneficial parasitoids.

NOSB COMITEE RECOMMENDATION:

According to US EPA - Office if Pesticide Programs neither Ammonium carbonate nor Urea, are included on the list of Active Ingredients of minimum Risk Pesticides exempted under FIFRA Section 25(b).

Urea is included on the List 4A-of minimal risk inert ingredients and Ammonium carbonate is included on the List 4B of inerts which have sufficient data to substantiate and can be used safely in pesticides products but not on the List 4A.

We shall be grateful having your aspect on the subject.

The date of the NOSB meeting at which urea will be evaluated is scheduled for April 28-30, 2004, in Chicago, IL.

Yours sincerely. Nick Stavrakis

P.S. Please inform me if you did receive my email.

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